

GEORGE W. WATSON III

One Financial Plaza, 14th Floor
Providence, RI 02903-2485
Main (401) 709-3300
Fax (401) 709-3399
gwatson@rc.com
Direct (401) 709-3351

Also admitted in Massachusetts,
Connecticut and Vermont

March 13, 2023

VIA HAND DELIVERY & ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Docket No. 22-42-NG – Issuance of Advisory Opinion to EFSB re RIE Application to Construct an LNG Vaporization Facility on Old Mill Lane, Portsmouth, RI Prefiled Testimony of Stephanie A. Briggs

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company (the “Company”), I have enclosed a copy of the Prefiled Testimony of Stephanie A. Briggs in the above-referenced docket.

Thank you for your attention to this matter. If you have any questions, please contact me at (401) 709-3351.

Sincerely,



George W. Watson III

Enclosures

cc: Docket 22-42-NG Service List

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate were electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Heidi J. Seddon

March 13, 2023

Date

**Docket No. 22-42-NG – Needs Advisory Opinion to EFSB regarding Narragansett Electric LNG Vaporization Facility at Old Mill, Portsmouth, RI
Service List update 2/13/2023**

Name/Address	E-mail	Phone
The Narragansett Electric Co. George Watson, Esq. Robinson & Cole LLP One Financial Plaza, 14 th Floor Providence, RI 02903 Celia O'Brien Narragansett Electric Co.	gwatson@rc.com ;	
	LPimentel@rc.com ;	
	SBoyajian@rc.com ;	
	RJReybitz@pplweb.com ;	
	COBrien@pplweb.com ;	
	jscanlon@pplweb.com ;	
	NSUcci@RIEnergy.com ;	
Division of Public Utilities and Carriers Tiffany Parenteau, Esq.	TParenteau@riag.ri.gov ;	
	Christy.hetherington@dpuc.ri.gov ;	
	Al.mancini@dpuc.ri.gov ;	
	John.bell@dpuc.ri.gov ;	
	Margaret.l.hogan@dpuc.ri.gov ;	
	Paul.roberty@dpuc.ri.gov ;	
	ellen.golde@puc.ri.gov ;	
Bruce Oliver	br.oliver@verizon.net ;	
Office of Energy Resources Albert Vitali, Esq. Christopher Kearns	Albert.Vitali@doa.ri.gov ;	
	Christopher.Kearns@energy.ri.gov ;	
	William.Owen@energy.ri.gov ;	

	Nancy.russolino@doa.ri.gov ;	
Statewide Planning Department Mary-Rose Pellegrino, Esq. Roberta Groch	MaryRose.Pellegrino@doa.ri.gov ;	
	Roberta.Groch@doa.ri.gov ;	
Town of Portsmouth Terence J. Tierney, Esq. Kevin Gavin, Town Solicitor Richard Rainer, Jr., Town Administrator Jennifer West, Town Clerk	Tierneylaw@yahoo.com ;	
	kevingavinlaw@gmail.com ;	
	rrainer@portsmouthri.com ;	
	clerkoffice@portsmouthri.com ;	
Acadia Center Hank Webster, Esq. - RI Director & Sr. Policy Advocate	HWebster@acadiacenter.org ;	
Town of Middletown Marisa Desautel, Esq. Wendy Marshall, Town Clerk	Marisa@desautelesq.com ;	
	wmarshall@middletownri.com ;	
	jeff.loiter@gmail.com ;	
	mdewey@desautelesq.com ;	
Conservation Law Foundation James Crowley, Esq. Margaret E. Curran, Esq David Hill Earnest White	jcrowley@clf.org ;	
	mcurran@clf.org ;	
	dhill@energyfuturesgroup.com ;	
	ewhite@energyfuturesgroup.com ;	
RI Attorney General Nicholas M. Vaz, Esq.	NVaz@riag.ri.gov ;	
Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov ;	401-780-2107
	Cynthia.WilsonFrias@puc.ri.gov ;	
	Alan.nault@puc.ri.gov ;	
	Todd.bianco@puc.ri.gov ;	
Interested Parties:		
Gabrielle Stebbins	gstebbins@energyfuturesgroup.com ;	
Matt Sullivan (Green Dev)	ms@green-ri.com ;	

THE NARRAGANSETT ELECTRIC COMPANY
RIPUC Docket No. 22-42-NG
In Re: Issuance of Advisory Opinion to Energy Facility Siting Board
Regarding Aquidneck Island Gas Reliability Project
Witness: Briggs

PRE-FILED DIRECT TESTIMONY
OF
STEPHANIE A. BRIGGS

TABLE OF CONTENTS

	<u>Page</u>
I. INTRODUCTION AND QUALIFICATIONS	1
II. PURPOSE OF TESTIMONY	3
III. DESCRIPTION OF COST RECOVERY MECHANISMS	3
IV. CONCLUSION.....	7

1 **I. Introduction and Qualifications**

2 **Q. Please state your name and business address.**

3 A. My name is Stephanie A. Briggs, and my business address is 280 Melrose Street,
4 Providence, Rhode Island 02907.

5
6 **Q. By whom are you employed and in what capacity?**

7 A. I am employed by PPL Services Corporation (“Services Corporation”) as a Senior
8 Manager of Revenue and Rates. The Services Corporation provides administrative,
9 management, and support services to PPL Corporation (“PPL”) and its subsidiary
10 companies, including The Narragansett Electric Company (the “Company”). My current
11 duties include responsibility for revenue requirement and rates calculations for the
12 Company.

13
14 **Q. Could you please describe your educational background and professional
15 experience?**

16 A. In 2000, I received a Bachelor of Arts degree in Accounting from Bryant College. In
17 2004, I joined National Grid USA Service Company, Inc. (“NGSC”) as a Senior Analyst
18 in the Accounting Department. In this position, I was responsible for supporting the
19 books and records of one of National Grid USA’s (“National Grid”) New York affiliates.
20 In 2009, I joined NGSC’s Regulatory Accounting Group. In 2011, I was promoted to
21 Lead Specialist for Revenue Requirements supporting New York. In 2017, I was
22 promoted to Director of Revenue Requirements for New York. In July 2020, I became

1 Director of Revenue Requirements for New England. On May 25, 2022, PPL Rhode
2 Island Holdings, LLC, a wholly owned indirect subsidiary of PPL, acquired 100 percent
3 of the outstanding shares of common stock of the Company from National Grid at which
4 time I began working in my current position.

5
6 **Q. Have you previously testified before the Public Utilities Commission**
7 **(“Commission”) or any other regulatory commission?**

8 A. Yes. I provided pre-filed direct testimony in numerous dockets, including the Company’s
9 2022 Annual Retail Rate Filing, Docket No. 5234; the Company’s 2021 Performance
10 Incentive Mechanism Factor Filing, as part of Docket No. 4770; the Fiscal Year 2022
11 Electric Infrastructure, Safety, and Reliability Plan Annual Reconciliation Filing, Docket
12 No. 5098; the Company’s 2022 Distribution Adjustment Charge Filing, Docket No. 22-
13 13-NG; the Company’s Advanced Metering Functionality Business Case, Docket No. 22-
14 49-EL; and most recently in the Company’s Fiscal Year 2024 Electric Infrastructure,
15 Safety, and Reliability Plan, Docket No. 22-53-EL. I also have testified before the
16 Massachusetts Department of Public Utilities and New York Public Service Commission
17 on behalf of the Company’s former affiliates as a revenue requirement witness in various
18 proceedings.

19
20 **Q. Are you familiar with the Aquidneck Island Gas Reliability Project (the “Project”)?**

21 A. Yes.

22

1 **II. Purpose of Testimony**

2 **Q. What is the scope of your testimony in this proceeding?**

3 A. This testimony explains the cost recovery mechanisms and estimated bill impacts, to the
4 extent calculable, for the Project and for any technically feasible alternatives to the
5 Project that address the need identified in the pre-filed direct testimony of Company
6 Witnesses Julie M. Porcaro and Jeffrey A. Montigny.

7
8 **Q. Are you familiar with the Application and Siting Report dated April 2022 (“Siting
9 Report”) that were submitted to the Rhode Island Energy Facility Siting Board?**

10 A. Yes.

11
12 **Q. Are you familiar with the need and alternative analysis provided in the Siting
13 Report and in the pre-filed direct testimony filed by Company Witnesses Porcaro
14 and Montigny?**

15 A. Yes.

16

17 **III. Description of Cost Recovery Mechanisms**

18 **Q. How has the Company recovered the cost of setup and mobilization of its mobile
19 liquefied natural gas (“LNG”) operations at Old Mill Lane since the winter 2019-
20 2020?**

21 A. The Company has recovered the cost of setup and mobilization of its mobile LNG
22 operations at Old Mill Lane through the Gas Cost Recovery (“GCR”) mechanism since

1 the winter 2019-2020. In the Company’s 2022 GCR filing, considered by the
2 Commission in Docket No. 22-20-NG, the forecasted cost of equipment rental, LNG
3 trucking, and other expenses of operations at Old Mill Lane, exclusive of commodity
4 costs, was \$1.35 million.

5
6 **Q. Is the recovery method linked to, or dependent upon, whether the Project is needed**
7 **to support a capacity vulnerability versus a capacity constraint?**

8 A. No. At this time, the contracted services and commodity costs are recovered through the
9 GCR regardless of the reason for the deployment of portable LNG equipment at Old Mill
10 Lane.

11
12 **Q. Is the cost recovery mechanism for the proposed site work associated with the**
13 **Project different than the cost recovery mechanism for the equipment, LNG fuel,**
14 **and O&M costs?**

15 A. Yes. For visibility, the Company has included the initial spend of approximately \$0.5
16 million of proposed Project costs for site work under the section entitled “Notable Capital
17 Projects Not Currently included in the ISR” of its Fiscal Year (“FY”) 2024 Gas
18 Infrastructure, Safety, and Reliability (“ISR”) Plan currently pending before the
19 Commission in Docket No. 22-54-NG and anticipates including the remaining \$14.5
20 million of proposed Project costs for site work in the actual budget proposal of FY 2025
21 Gas ISR Plan because it is the first year that associated assets are forecast to be placed in-
22 service. The Company proposes to recover the resulting revenue requirement through the

1 Gas ISR recovery mechanism once the Project is placed in service. The estimated Project
2 costs that are included in the Company's FY 2024 Gas ISR Plan are not factored into the
3 FY 2024 Gas ISR Plan revenue requirement because the Company has yet to obtain the
4 necessary approvals to proceed with construction and place the Project into service. The
5 Company presently anticipates that the Project would be placed into service in FY 2025 if
6 it obtains all necessary approvals. The Company proposes to recover the costs for the site
7 work through the Gas ISR factor until the Company's next general base rate case, at
8 which time the capital investments placed in service would be included in rate base and
9 recovered through base distribution rates.

10
11 **Q. Are the cost recovery mechanism and associated bill impacts dependent upon the**
12 **estimated useful life of the Project?**

13 A. No. Estimated useful lives of capital investments do not determine the cost recovery
14 mechanism that would be used for the Project. The resulting bill impacts, however, may
15 be dependent on the estimated useful life that is used in the cost recovery mechanism.

16
17 **Q. Is the Company planning to change the cost recovery methodology for the current**
18 **costs of the equipment, LNG fuel, and O&M costs that will continue until the**
19 **Project is placed in service?**

20 A. No.

21

1 **Q. Will the proposed purchase of LNG storage tanks and vaporizers for the Project**
2 **change the mechanism through which the Company recovers the cost of mobile**
3 **LNG operations at Old Mill Lane?**

4 A. Yes. If the Company purchases LNG equipment as proposed, the capital cost of the
5 equipment purchased would be included for cost recovery in the annual Gas ISR factor
6 when the purchased equipment is placed into service. The future rental equipment costs
7 that would be avoided by the purchase of the equipment would result in a reduction of
8 costs that would otherwise be considered a gas cost recovered through the GCR. For
9 other costs of mobile LNG operations at Old Mill Lane that are not impacted by the
10 purchase of LNG equipment, such as commodity costs and LNG trucking, the Company
11 proposes to continue to recover those costs in the same mechanism that is currently used.

12
13 **Q. Are you aware of a technically feasible alternative to the Project?**

14 A. No. Based on the Siting Report and the pre-filed direct testimony provided by Company
15 Witnesses Porcaro and Montigny in this proceeding, it is my understanding that there are
16 no technically feasible alternatives to the Project to address the capacity vulnerability
17 aside from construction of transmission pipeline infrastructure that Algonquin Gas
18 Transmission does not intend to undertake. This is due to Old Mill Lane allowing for
19 higher vaporization rates than the other alternatives summarized in the Siting Report.

20

1 **Q. Using the most recently proposed model and assumptions from the FY 2024 Gas**
2 **ISR Plan, what would be the estimated annual revenue requirement and bill impact**
3 **resulting from the construction of the Project?**

4 A. Although it is not anticipated that the Project would be placed into service in FY 2024,
5 for illustrative purposes, the estimated \$15 million in costs for construction of the Project
6 would result in an annual revenue requirement of \$1.4 million for the first full year after
7 the Project is placed in service. Using the model employed in the FY 2024 Gas ISR Plan,
8 for an average residential heating customer using 845 therms per year, this would result
9 in an estimated annual bill impact of \$7.22, or 0.4 percent.

10

11 **IV. Conclusion**

12 **Q. Does this complete your testimony?**

13 A. Yes, it does.